

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

UNITED STATES OF AMERICA)	
)	
v.)	Crim. Number 21-150-JAW
)	
JEFFREY RICHARD.)	

MOTION TO CONTINUE PLEA TRIAL AS WELL AS PLEA HEARING

COMES NOW the Defendant, by and through counsel, and for his motion to continue, states as follows:

1. Trial of this matter is presently scheduled for the January trial list with jury selection scheduled for January 3, 2023.
2. This matter is currently scheduled for jury selection on January 3, 2023. However, the matter has also been set for a plea on December 15, 2022.
3. Defense counsel has been retained only recently and will need some time to become familiar with the evidence in this case, to adequately represent Defendant during the plea hearing.¹

¹ Although counsel is requesting that the case be continued until the February trial list, it is anticipated that the matter will be resolved by plea, pursuant to a plea agreement.

4. Defense counsel anticipates that a thirty-day continuance will be sufficient to review the evidence and be prepared for the plea hearing.
5. Defense counsel has, by telephone, informed the government attorney, Craig Wolfe, AUSA, that a continuance would be requested for the purpose outlined above. The government does not oppose a continuance.
6. The Defendant has been advised by counsel of his rights pursuant to the Speedy Trial Act. Having been advised of his Speedy trial Act rights, and representing that he understands those rights, Defendant waives said rights and consents to the exclusion of the time from today's date until the next scheduled trial date from the Speedy Trial clock. Both counsel and the defendant assert that it is in the interests of justice that this matter be continued for the purpose outlined above.

WHEREFORE, Defendant hereby requests that this matter be continued from the present trial date to a date during the February trial term, and that the plea hearing that is scheduled for December 15, 2022, be continued to a date certain in mid-January, 2023.

Dated at Portland, Maine this 12th day of December, 2022.

/s/Peter E. Rodway
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I hereby certify that on December 12, 2022, I electronically filed Defendant's Motion to Continue with the Clerk of Court using the CM/ECF system which will send notification of such filing to Assistant United States Attorney Craig Wolfe, and I hereby certify that on December 12, 2022, I e-mailed the document to the following non-registered participant: Mr. Jeffrey Richard.

/s/Peter E. Rodway
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